

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW MCDERMOTT,

Plaintiff,

- against -

MONDAY MONDAY, LLC

Defendant.

Docket No. 17-cv-09230 (DLC)

**NOTICE OF MOTION OF  
PLAINTIFF'S MOTION TO  
REDACT THE TERM  
"COPYRIGHT TROLL"  
FROM THE DECISION AND  
ORDER, DATED  
FEBRUARY 22, 2018 [Dkt.  
#21], PURSUANT TO  
FED.R.CIV.P. 60(b)(1);  
60(b)(6)**

**PLEASE TAKE NOTICE** that, upon this Notice of Motion; the memorandum of law in support thereof and exhibits attached thereto; and the pleadings and prior proceedings herein; Plaintiff will move the Court, before the Honorable Denise L. Cote (U.S.D.J.) at the United States District Court, 500 Pearl Street, New York, New York 10007, at a time set by the Court for an Order to REDACT the term "Copyright Troll" from the Court's Decision and Order, dated February 22, 2018 [ECF Docket # 21] pursuant to Rule 60(b)(1) of the Federal Rules of Civil Procedure or, in the alternative Rule 60(b)(6), and for such further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that because Defendant never requested that the Court use the term "Copyright Troll" to describe Plaintiff's counsel, Plaintiff does not reasonably expect Defendant to participate in this Motion. However, if the Court invites Defendant to respond, or Defendant seeks to oppose Plaintiff's prayer for relief, then Defendant's opposition papers, if any, must be served by April 12, 2018; and Plaintiff's reply must be served by April 19, 2018.

Dated: Valley Stream, New York  
March 29, 2018

Respectfully submitted,

LIEBOWITZ LAW FIRM, PLLC

**By: /Richard Liebowitz/**

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